

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. <u>09-</u></b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: <u>May 8, 2009</u></b>
<b>JENNIE HILL</b>	<b>:</b>	<b>VIOLATIONS:</b>
	<b>:</b>	<b>18 U.S.C. § 371 (conspiracy - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 1344 (bank fraud - 2 counts)</b>
	<b>:</b>	<b>18 U.S.C. § 1028A (aggravated identity</b>
	<b>:</b>	<b>theft - 9 counts)</b>
	<b>:</b>	<b>18 U.S.C. § 2 (aiding and abetting)</b>
	<b>:</b>	<b>Notice of forfeiture</b>

**INFORMATION**

**COUNT ONE**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

At all times material to this information:

1. Citizens Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation ("FDIC"), with certificate number 57282.
2. From on or about December 5, 2005 through on or about February 14, 2006, in the Eastern District of Pennsylvania and elsewhere, defendant

**JENNIE HILL**

conspired and agreed with co-conspirators 1 and 2, who are known to the United States Attorney, and others, known and unknown to the United States Attorney, to commit offenses against the United States, that is, to knowingly execute, and attempt to execute, and aid and abet the execution of, bank fraud, in violation of Title 18, United States Code, Section 1344, and to knowingly and without lawful authority use a means of identification of another person during

and in relation to a bank fraud, in violation of Title 18, United States Code, Section 1028A(a)(1).

### **MANNER AND MEANS**

3. It was part of the conspiracy that defendant JENNIE HILL and others used the names, dates of births, addresses, social security numbers, bank account numbers, and other means of identification of customers of Citizens Bank to enrich themselves and defraud these banks by posing as customers of the banks at the teller windows and withdrawing funds from the customers' accounts.

It was further a part of the conspiracy that:

4. Defendant JENNIE HILL acted as a "check runner," posing as various bank customers to make fraudulent withdrawals from the bank accounts of those customers. In that capacity, defendant HILL performed some or all of the following:

a. she received from co-conspirators 1 and 2, and others personal identifying information for customers of Citizens Bank, including the bank customers' names, dates of birth, social security numbers, and bank account numbers;

b. she received from co-conspirators 1 and 2, and others, in addition to the bank customers' account information, false photographic identification in the name of each customer; and

c. she cashed fraudulent checks against the accounts of bank customers, using the bank customers' account information and false photographic identification.

5. Defendant JENNIE HILL fraudulently obtained, and aided and abetted the obtaining of, more than \$92,000 from the cashing of fraudulent checks.

## OVERT ACTS

In furtherance of the conspiracy, defendant JENNIE HILL, co-conspirators 1 and 2, and others committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. On or about the following dates, defendant JENNIE HILL, accompanied by co-conspirators 1 and 2 and others, fraudulently withdrew or attempted to withdraw funds in the amounts listed below, from Citizens Bank, in the names of Citizens Bank account holders identified below, using the account number of, and fraudulent identification in the name of, the account holders, which had been provided to defendant HILL by co-conspirators 1 and 2 and others. Each withdrawal and attempted withdrawal constitutes a separate over act:

<u>DATE</u>	<u>LOCATION</u>	<u>VICTIM ACCOUNT HOLDER</u>	<u>AMOUNT OF CHECK CASHED</u>
12/05/05	New Hampshire	M.L.	\$9,264
12/05/05	Vermont	C.L.	\$9,265
12/06/05	Vermont	N.S.	\$9,072
1/12/06	Ohio	S.E.	\$19,376
1/13/06	Ohio	D.D.	\$4,852
2/02/06	Michigan	Ca.C.	\$9,682
2/02/06	Michigan	Cy.C.	\$19,359
2/03/06	Michigan	A.W.	\$11,136

2. On or about February 13 and February 14, 2006, defendant JENNIE HILL accompanied co-conspirators 1 and 2 and others on a trip to Indiana to cash fraudulent checks at branches of Citizens Bank.

All in violation of Title 18, United States Code, Section 371.

## **COUNT TWO**

### **THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 and 3 through 5 and Overt Act 1 of Count One are incorporated here.
2. From on or about December 5, 2005 to on or about February 3, 2006, in the Eastern District of Pennsylvania and elsewhere, defendant

### **JENNIE HILL**

knowingly executed, and aided and abetted the execution of, a scheme to defraud Citizens Bank, and to obtain monies owned by and under the care, custody, and control of that bank by means of false and fraudulent pretenses, representations, and promises.

### **THE SCHEME**

3. Defendant JENNIE HILL used stolen account information and false identification documents of M.L., C.L., N.S., S.E., D.D., Ca.C., Cy.C., and A.W., account holders of Citizens Bank, to fraudulently withdraw money from the accounts of M.L., C.L., N.S., S.E., D.D., Ca.C., Cy.C., and A.W., and share the proceeds with others.
4. In furtherance of the scheme, defendant JENNIE HILL cashed the following fraudulent checks:

<b><u>DATE</u></b>	<b><u>LOCATION</u></b>	<b><u>VICTIM ACCOUNT HOLDER</u></b>	<b><u>AMOUNT OF CHECK CASHED</u></b>
12/05/05	New Hampshire	M.L.	\$4,609
12/05/05	Vermont	M.L.	\$4,655
12/05/05	Vermont	C.L.	\$4,654

12/05/05	Vermont	C.L	\$4,611
12/06/05	Vermont	N.S.	\$4,536
12/06/05	Vermont	N.S	\$4,536
1/12/06	Ohio	S.E.	\$4,835
1/12/06	Ohio	S.E.	\$4,851
1/12/06	Ohio	S.E.	\$4,829
1/12/06	Ohio	S.E.	\$4,861
1/13/06	Ohio	D.D.	\$4,852
2/02/06	Michigan	Ca.C.	\$4,851
2/02/06	Michigan	Ca.C.	\$4,831
2/02/06	Michigan	Cy.C.	\$4,861
2/02/06	Michigan	Cy.C.	\$4,835
2/02/06	Michigan	Cy.C.	\$4,811
2/02/06	Michigan	Cy.C.	\$4,852
2/03/06	Michigan	A.W.	\$4,831
2/03/06	Michigan	A.W.	\$4,805
2/03/06	Michigan	A.W.	\$1,500

All in violation of Title 18, United States Code, Sections 1344 and 2.

**COUNTS THREE THROUGH TEN**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

On or about the dates listed below, in the Eastern District of Pennsylvania and elsewhere, defendant

**JENNIE HILL**

knowingly and without lawful authority, used, and aided and abetted the transfer, possession and use of, a means of identification of another person, that is, the name and personal identifying information of the persons indicated below, each person constituting a separate count, during and in relation to bank fraud.

<u>COUNT</u>	<u>DATE</u>	<u>ACCOUNT HOLDER</u>
3	12/05/05	M.L.
4	12/05/05	C.L.
5	12/06/05	N.S.
6	01/12/06	S.E.
7	01/13/06	D.D.
8	02/02/06	Ca.C.
9	02/02/06	Cy.C.
10	02/03/06	A.W.

All in violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and

2.

## **COUNT ELEVEN**

### **THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

At all times material to this information:

1. Commerce Bank was a financial institution, the deposits of which were insured by the FDIC, with certificate number 21140.
2. On or about October 4, 2005, in the Eastern District of Pennsylvania and elsewhere, defendant

### **JENNIE HILL**

knowingly attempted to execute, and aided and abetted the execution of, a scheme to defraud Commerce Bank, and to obtain monies owned by and under the care, custody, and control of that bank by means of false and fraudulent pretenses, representations, and promises.

### **THE SCHEME**

3. Defendant JENNIE HILL used stolen account information and false identification documents of C.R., an account holder of Commerce Bank, to fraudulently withdraw money from the account of C.R., and share the proceeds with others.
4. In furtherance of the scheme, on or about October 4, 2005, defendant JENNIE HILL attempted to cash a fraudulent check in the amount of \$2,507 against the Commerce Bank account of C.R. at a Commerce Bank branch in Delaware.

All in violation of Title 18, United States Code, Sections 1344 and 2.



**COUNT TWELVE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

On or about October 4, 2005, in the Eastern District of Pennsylvania and elsewhere, defendant

**JENNIE HILL**

knowingly and without lawful authority, used, and aided and abetted the possession and use of, a means of identification of another person, that is, the name and personal identifying information of C.R., during and in relation to bank fraud.

All in violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and 2.

## **NOTICE OF FORFEITURE**

### **THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 18, United States Code, Sections 371 and 1344, set forth in this information, defendant

#### **JENNIE HILL**

shall forfeit to the United States of America any property that constitutes, or is derived from proceeds obtained directly or indirectly from the commission of such offenses, including, but not limited to, the sum of \$90,154.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982(a)(2).

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**LAURIE MAGID**  
**United States Attorney**